

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Yunseo CHUNG,

Plaintiff-Petitioner,

v.

Case No.25-cv-2412

Donald J. TRUMP, in his official capacity as President of the United States of America; Marco RUBIO, in his official capacity as Secretary of State, U.S. Department of State; Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice; Kristi NOEM, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; and William P. JOYCE, in his official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

Defendants-Respondents.

DECLARATION OF SONYA LEVITOVA

I, Sonya Levitova, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Sonya Levitova. I am a licensed attorney in good standing in the state of New York. I am an attorney of record for Plaintiff-Petitioner Yunseo Chung in the above-captioned case.
2. I submit this declaration in support of Ms. Chung's proposed order to show cause for a temporary restraining order and preliminary injunctive relief in this action.
3. Attached hereto as Exhibit A is a true and correct copy of the Politico article by Amanda Friedman, titled "Rubio Defends Detainment of Columbia Activist, Says More Arrests

Will Come,” published on March 16, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/U3DR-KCPL>.

4. Attached hereto as Exhibit B is a true and correct copy of the New York Times article by Luis Ferré-Sadurní and Hamed Aleaziz, titled “How a Columbia Student Fled to Canada After ICE Came Looking for Her,” published on March 15, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/3YH3-5U5K>.

5. Attached hereto as Exhibit C is a true and correct copy of excerpts from the full transcript of an interview with Troy Edgar, the Deputy Secretary of the Department of Homeland Security, on NPR’s Morning Edition on March 13, 2025. I downloaded and saved this transcript in PDF format; it is also available at <https://perma.cc/N6QY-4PWF>.

6. Attached hereto as Exhibit D is a true and correct copy of the Associated Press article by Jake Offenhartz, titled “Immigration Agents Arrest Palestinian Activist Who Helped Lead Columbia University Protests,” published on March 9, 2025. I downloaded and saved this article in PDF format; it is also available at <https://perma.cc/HPH9-T2SV>.

7. Attached hereto as Exhibit E is a true and correct copy of the New York Times article by Hank Sanders and Zolan Kanno-Youngs, titled “D.H.S. Detains a Georgetown University Academic,” published on March 19, 2025. I downloaded and saved this article in PDF format; it is also available at: https://www.nytimes.com/2025/03/19/us/politics/georgetown-suri-detained.html?unlocked_article_code=1.6U4.jXDv.MhO70190aEl5&smid=url-share.

8. Attached hereto as Exhibit F is a true and correct copy of The New Republic article by Malcolm Ferguson, titled “The Sinister Way Trump’s DOJ Tried to Deport Cornell Student Protester,” published on March 21, 2025. I downloaded and saved this article in PDF format; it is also available at: <https://perma.cc/DU3Q-RE8W>.

9. Attached hereto as Exhibit G is a true and correct copy of the Denton Record-Chronicle article by Priscilla Rice, titled “Palestinian woman arrested by ICE in New Jersey detained in North Texas,” published on March 18, 2025. I downloaded and saved this article in PDF format; it is also available at: <https://perma.cc/9J5D-X5B7>.

10. Attached hereto as Exhibit H is a true and correct copy of the Desk Appearance Ticket issued to Ms. Chung. Personally identifying information has been redacted in the publicly filed version of this Exhibit.

11. Attached hereto as Exhibit I is a true and correct copy of the text message that Ms. Chung received on March 9, 2025, from an individual identifying herself as “Audrey with the police.” The HSI agent’s phone number has been redacted in the publicly filed version of this Exhibit.

12. Attached hereto as Exhibit J is a true and correct copy of the administrative arrest warrant Plaintiff-Petitioner’s counsel Naz Ahmad received from AUSA Perry Carbone via text message. Ms. Chung’s “A” number has been redacted in the publicly filed version of this Exhibit.

13. Attached hereto as Exhibit K is a true and correct copy of a judicial search warrant executed at two Columbia-owned residences on March 13, 2025. Information identifying another person whose address and name appear in the warrant has been redacted in the publicly filed version of this Exhibit.

14. Attached hereto as Exhibit L is a true and correct copy of The Atlantic article by Nick Miroff, titled “There Was a Second Name on Rubio’s Target List” published on March 13, 2025. I downloaded and saved this article in PDF format; it is also available at: <https://perma.cc/6FWZ-E8AN>.

15. Attached hereto as Exhibit M is a Declaration from Nayantara Bhushan, dated March 23, 2025.

16. Attached hereto as Exhibit N is a Declaration from Plaintiff-Petitioner's counsel Naz Ahmad, dated March 24, 2025.

17. Attached here to as Exhibit O is a true and correct copy of the original and amended Notice to Appear issued to Mahmoud Khalil, included in the government's filing to dismiss his petition, filed on March 21, 2025. This version was redacted by the government.

18. Attached hereto as Exhibit P is a true and correct copy of the Columbia University Public Safety email to Yunseo Chung from March 9, 2025. Ms. Chung's email address has been redacted in the publicly filed version of this Exhibit.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 24, 2025
New York, New York

/s Sonya Levitova
Sonya Levitova

Attorney for Plaintiff-Petitioner